

Message

**From:** Dixon Monty USGR [monty.dixon@syngenta.com]  
**Sent:** 10/26/2020 10:54:15 PM  
**To:** Kenny, Daniel [Kenny.Dan@epa.gov]; Meadows, Sarah [Meadows.Sarah@epa.gov]; Schmid, Emily [Schmid.Emily@epa.gov]  
**CC:** Echeverria, Marietta [Echeverria.Marietta@epa.gov]; Crawford, Lydia [Crawford.Lydia@epa.gov]  
**Subject:** RE: Tavium Label  
**Attachments:** ATT00001.txt; Proposed hooded shielded sprayer language.docx

**Importance:** High

Hi Sarah,

After comparison of the label and speaking with our technical expert...there is a difference between hooded shielded broadcast and hooded in-row and directed layby sprayers. We had mirrored the language on the Xtendimax label but that was removed based on comments Friday. It appears these directions have been retained on the pending Xtendimax label and for consistency, we would like to retain. I have pulled these statements together on the attached word document. Can these be returned to the label as shown below, they mirror the Bayer language:

Please let me know your thoughts...we can have the label back quickly.

Monty

Proposed Tavium	Xtendimax
For hooded/shielded sprayers, all application nozzles must be contained within the enclosed area. Shielding the boom or individual nozzles can reduce the effects of wind. However, it is the responsibility of the applicator to verify that the shields are preventing drift and not interfering with uniform deposition of the product. Applicators must ensure the sprayer system is off or controlled during turns to further prevent spray drift. Refer to the hooded/shielded sprayer manufacturer use specifications prior to use.	<p><b>Hooded/Shielded Broadcast Sprayer:</b>  For hooded/shielded sprayers, all application nozzles must be contained within the enclosed area. Shielding the boom or individual nozzles can reduce the effects of wind. However, it is the responsibility of the applicator to verify that the shields are preventing drift and not interfering with uniform deposition of the product. Applicators must ensure the sprayer system is off or controlled during turns to further prevent spray drift. Refer to the hooded/shielded sprayer manufacturer use specifications prior to use.</p> <p style="text-align: center;">8</p>
<p><i>Requirements for Reduced Use Restrictions with Optional Hooded/Shielded Sprayer: ONLY <b>qualified</b> hooded/shielded sprayers listed on <a href="http://www.Taviumtankmix.com">www.Taviumtankmix.com</a> are eligible for reduced use restrictions when applying this product. When using a qualified hooded/shielded sprayer, the applicator must <b>always maintain a minimum 110-foot downwind buffer</b> between the last treated row and the nearest downwind field edge. Consult Endangered Species</i></p>	<p>not interfering with uniform deposition of the product. Applicators must ensure the sprayer system is off or controlled during turns to further prevent spray drift. Refer to the hooded/shielded sprayer manufacturer use specifications prior to use.</p> <p><i>Requirements for Reduced Use Restrictions with Optional Hooded/Shielded Sprayer: ONLY <b>qualified</b> hooded/shielded sprayers listed on <a href="http://www.Xtendimaxapplicationrequirements.com">www.Xtendimaxapplicationrequirements.com</a> are eligible for reduced use restrictions when applying this product. When using a qualified hooded/shielded sprayer, the applicator <b>must always maintain a minimum 110-foot downwind buffer</b> between the last treated row and the nearest downwind field edge. Consult Endangered Species Protection Bulletins for Endangered Species. While this product may be applied with other (non-qualified) hooded/shielded sprayers, no reduction in use restrictions applies to their use.</i></p>

Protection Bulletins for ESA counties and restrictions. While this product may be applied with other (non-qualified) hooded/shielded sprayers, no reduction in use restrictions is associated with their use.

Using a hooded sprayer or other drift reduction technology in combination with approved nozzles may further reduce drift potential. When applying A21472 Plus VaporGrip Technology by hooded in-row or layby sprayers, determine the amount of herbicide and water volume needed using the following formula:

$$\frac{\text{band width (inches)}}{\text{row width (inches)}} * \text{broadcast rate per acre} = \text{rate per treated acre}$$

$$\frac{\text{band width (inches)}}{\text{row width (inches)}} * \text{broadcast spray volume per acre} = \text{spray volume per treated acre}$$

#### Ground Application (Hooded In-Row and Directed Layby)

Using a hooded sprayer or other drift reduction technology in combination with approved nozzles may further reduce drift potential. When applying XtendiMax® With VaporGrip® Technology by hooded in-row or layby sprayers, determine the amount of herbicide and water volume needed using the following formula:

$$\frac{\text{band width (inches)}}{\text{row width (inches)}} * \text{broadcast rate per acre} = \text{rate per treated acre}$$

$$\frac{\text{band width (inches)}}{\text{row width (inches)}} * \text{broadcast spray volume per acre} = \text{spray volume per treated acre}$$

**From:** Kenny, Daniel <Kenny.Dan@epa.gov>

**Sent:** Monday, October 26, 2020 6:32 PM

**To:** Dixon Monty USGR <monty.dixon@syngenta.com>; Meadows, Sarah <Meadows.Sarah@epa.gov>; Schmid, Emily <Schmid.Emily@epa.gov>

**Cc:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Crawford, Lydia <Crawford.Lydia@epa.gov>

**Subject:** RE: Tavium Label

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Sorry Monty, I misread the text. Please disregard my earlier message.

Dan

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**From:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>

**Sent:** Monday, October 26, 2020 6:24 PM

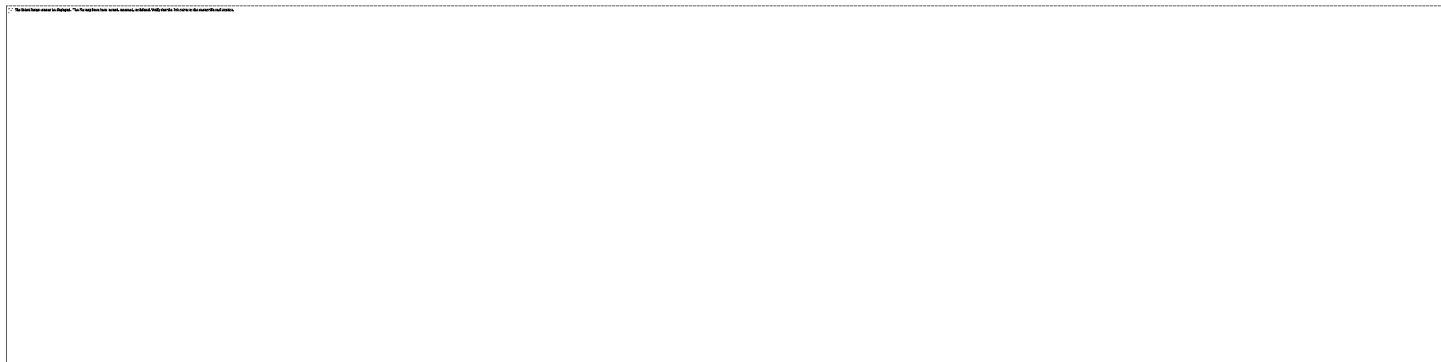
**To:** Meadows, Sarah <[Meadows.Sarah@epa.gov](mailto:Meadows.Sarah@epa.gov)>; Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>

**Cc:** Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>; Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Crawford, Lydia <[Crawford.Lydia@epa.gov](mailto:Crawford.Lydia@epa.gov)>

**Subject:** RE: Tavium Label

Hi Sarah,

Thanks. One last question to hopefully ensure consistency, Bayer shared their label with us which has the following:



We were instructed to remove this in our label comments received Friday (see below)

#### 4.7.2 Ground Application (Hooded In-Row and Directed Layby)

Using a hooded sprayer or other drift reduction technology in combination with approved nozzles may further reduce drift potential. ~~When applying A21472 Plus VaporGrip Technology by hooded in-row or layby sprayers, determine the amount of herbicide and water volume needed using the following formula:~~

~~$$\frac{\text{band width (inches)}}{\text{row width (inches)}} \times \text{broadcast rate per acre} = \text{rate per treated acre}$$~~

~~$$\frac{\text{band width (inches)}}{\text{row width (inches)}} \times \text{broadcast volume per acre} = \text{spray volume per treated acre}$$~~

May we include the struck language back?

Thanks

Monty

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**From:** Meadows, Sarah <[Meadows.Sarah@epa.gov](mailto:Meadows.Sarah@epa.gov)>

**Sent:** Monday, October 26, 2020 6:10 PM

**To:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>; Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>

**Cc:** Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>; Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Crawford, Lydia <[Crawford.Lydia@epa.gov](mailto:Crawford.Lydia@epa.gov)>

**Subject:** RE: Tavium Label

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Hi, Monty. You can go ahead and send me the new version now just in case we don't need another change. And there's no need for a highlighted copy, just a clean copy.

Thanks,

Sarah

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**From:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>  
**Sent:** Monday, October 26, 2020 6:08 PM  
**To:** Meadows, Sarah <[Meadows.Sarah@epa.gov](mailto:Meadows.Sarah@epa.gov)>; Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Cc:** Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>; Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Crawford, Lydia <[Crawford.Lydia@epa.gov](mailto:Crawford.Lydia@epa.gov)>  
**Subject:** RE: Tavium Label

Hi Sarah,

I will have that put back and we can send it back in the event there the other change ends up not being required unless you prefer me to wait for the final label change.

Also, for ease of these final reviews, would you prefer I only include version highlighting these last changes or is it better to include the version with all changes in the earlier iterations highlighted..

Thanks  
Monty

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**From:** Meadows, Sarah <[Meadows.Sarah@epa.gov](mailto:Meadows.Sarah@epa.gov)>  
**Sent:** Monday, October 26, 2020 5:37 PM  
**To:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>; Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Cc:** Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>; Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Crawford, Lydia <[Crawford.Lydia@epa.gov](mailto:Crawford.Lydia@epa.gov)>  
**Subject:** RE: Tavium Label

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Hi, Monty. I noticed one statement has been removed that we'll need you to add back. I have noted it in the attached file. There may be one other label change needed tonight, but I wanted to go ahead and give you the heads up on this.

Thanks,

Sarah

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**From:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>  
**Sent:** Monday, October 26, 2020 5:02 PM  
**To:** Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Cc:** Kenny, Daniel <[Kenny.Dan@epa.gov](mailto:Kenny.Dan@epa.gov)>; Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Meadows, Sarah

<Meadows.Sarah@epa.gov>; Crawford, Lydia <Crawford.Lydia@epa.gov>

**Subject:** RE: Tavium Label

Hi Emily,

Thanks and again apologies for sending multiple version so quickly. I am available at anytime the rest of the day/evening if needed.

Best Regards,  
Monty

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**From:** Schmid, Emily <Schmid.Emily@epa.gov>

**Sent:** Monday, October 26, 2020 4:34 PM

**To:** Dixon Monty USGR <monty.dixon@syngenta.com>

**Cc:** Kenny, Daniel <Kenny.Dan@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Meadows, Sarah <Meadows.Sarah@epa.gov>; Crawford, Lydia <Crawford.Lydia@epa.gov>

**Subject:** RE: Tavium Label

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Hi Monty,

Sarah is helping me check the label so I forwarded this latest version to her.

Thank you,  
Emily

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**From:** Dixon Monty USGR <monty.dixon@syngenta.com>

**Sent:** Monday, October 26, 2020 4:21 PM

**To:** Schmid, Emily <Schmid.Emily@epa.gov>; Crawford, Lydia <Crawford.Lydia@epa.gov>

**Cc:** Kenny, Daniel <Kenny.Dan@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>

**Subject:** RE: Tavium Label

**Importance:** High

Hi Emily,

I was just alerted to one change that will be needed for a smoc maximum rate in the cotton sections. Specifically, section 8.1.1 section 3.b. should read as follows:

- DO NO exceed ~~3.74~~ 2.48 lb ai/A/year of S-metolachlor-containing products on medium- or fine -textured soils.

This is the only needed change.

I am very sorry for this needed correction and hope this does not create too much inconvenience.

Thanks  
Monty

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**From:** Dixon Monty USGR

**Sent:** Monday, October 26, 2020 4:03 PM

**To:** 'Schmid, Emily' <Schmid.Emily@epa.gov>; 'Crawford, Lydia' <Crawford.Lydia@epa.gov>

ED\_005172A\_00000603-00005

ED\_005172C\_00000797-00005

Cc: kenny.dan@epa.gov <kenny.dan@epa.gov>; 'Echeverria, Marietta' <Echeverria.Marietta@epa.gov>

Subject: RE: Tavium Label

Hello Emily,

My label team just provided this version that highlights all changes made today including adding the typographical edits as well as those mentioned below. This version may be easier for your review. Please therefore find the clean and this version with only today's edits added.

Thanks

Monty

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From: Dixon Monty USGR

Sent: Monday, October 26, 2020 3:56 PM

To: Schmid, Emily <Schmid.Emily@epa.gov>; Crawford, Lydia <Crawford.Lydia@epa.gov>

Cc: kenny.dan@epa.gov <kenny.dan@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>

Subject: RE: Tavium Label

Hi Emily,

Please find attached the revised labels. As requested, we have added page numbers and made the following changes:

Section (Page)	Previous Version	New Version
4.7 (16)	Applications of this product may qualify for reduced use restrictions, such as a reduced downwind buffer distance, provided a <b>qualified DRT</b> listed on <a href="http://www.TaviumTankMix.com">www.TaviumTankMix.com</a> is used and operated according to the directions and limitations provided at <a href="http://www.TaviumTankMix.com">www.TaviumTankMix.com</a> .	<i>Deleted based upon guidance below</i>
4.7.1 (16)	<i>Requirements for Reduced Use Restrictions with Optional Hooded/Shielded Sprayer:</i> <b>ONLY qualified</b> hooded/shielded sprayers listed on <a href="http://www.TaviumTankMix.com">www.TaviumTankMix.com</a> are eligible for reduced use restrictions when applying this product. Refer to the website for specific application requirements when using a <b>qualified</b> hooded/shielded sprayer. While this product may be applied with other (non-qualified) hooded/shielded sprayers, no reduction in use restrictions is associated with their use.	<i>Requirements for Reduced Use Restrictions with Optional Hooded/Shielded Sprayer:</i> <b>ONLY qualified</b> hooded/shielded sprayers listed on <a href="http://www.TaviumTankMix.com">www.TaviumTankMix.com</a> are eligible for reduced use restrictions when applying this product. If a <b>qualified</b> hooded/shielded sprayer is used for applications to dicamba-tolerant soybeans, the downwind buffer is 110 feet. While this product may be applied with other (non-qualified) hooded/shielded sprayers, no reduction in use restrictions is associated with their use.
6.3.7 (23)	Roads, paved or gravel surfaces, mowed and/or managed areas adjacent to fields such as rights-of-ways.	Roads, paved or gravel surfaces, mowed grass areas adjacent to treated fields.

In addition, we corrected a couple of typos and removed the – from 240-foot to read 240 foot.

I have included a clean, highlighted (blue new edits) that includes all previous changes and then a single edit that shows the points in the chart above. Note the deletion in section 4.7 page 16 is not shown in the single edit but is in the highlighted version with all edits.

Please let me know if can do anything else on my end.

Thanks  
Monty

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**From:** Dixon Monty USGR  
**Sent:** Monday, October 26, 2020 3:16 PM  
**To:** Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Subject:** RE: Tavium Label

Hi Emily,

Just an update, hope to have label to you in next 15 to 20 minutes.

Thanks  
Monty

---

**From:** Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Sent:** Monday, October 26, 2020 1:45 PM  
**To:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>  
**Subject:** RE: Tavium Label

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Hi Monty,

Yes, I believe this is what he was talking about.

Add to "4.7 Optional Use of Drift Reduction Technology" (Page 15):  
If approved hooded sprayer is used, the downwind buffer is 110'.

Let me know if I'm misunderstanding and you are looking for something else.

Thanks,  
Emily

---

**From:** Dixon Monty USGR <[monty.dixon@syngenta.com](mailto:monty.dixon@syngenta.com)>  
**Sent:** Monday, October 26, 2020 1:39 PM  
**To:** Schmid, Emily <[Schmid.Emily@epa.gov](mailto:Schmid.Emily@epa.gov)>  
**Subject:** RE: Tavium Label

Hi Emily,

Yes, happy to do so. He had mentioned you were working on hooded sprayer language that we could incorporate. Do you have that by chance...if so we can add it to this version.

Thanks  
Monty

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**From:** Schmid, Emily <Schmid.Emily@epa.gov>  
**Sent:** Monday, October 26, 2020 1:37 PM  
**To:** Dixon Monty USGR <monty.dixon@syngenta.com>  
**Subject:** Tavium Label

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Hi Monty,

Dan let me know that you were working on last edits to the label. I noticed it doesn't have page numbers. Could you add those? It will fail QAQC without them and I don't want to risk that.

You can go ahead and send the revised label to me as soon as you have it ready.

Thanks!  
Emily

Emily Schmid  
Product Manager 25  
Herbicide Branch  
Registration Division, Office of Pesticide Programs  
U.S. Environmental Protection Agency

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